

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

DOCKET NO. 14-CR-10168-FDS

KEVIN SANDERSON

MOTION TO AMEND RELEASE CONDITIONS

NOW COMES accused, Kevin Sanderson, by and through counsel, Paul J. Garrity, and respectfully asks this Court (Bowler, MJ) to Amend the Conditions of his Release.

In support of this motion, the defendant states as follows:

1. One of the accused's release conditions was that he was to be on a curfew. The curfew is to be monitored by having him call into Probation by way of a land line. The accused does not have a land line.
2. Due to the accused's financial circumstances, obtaining a land line would be a financial burden.
3. The cost of the land line was an issue that was discussed at his initial appearance and led to this Court not requiring electronic monitoring.
4. That Assistant U.S. Attorney Leah B. Foley does not object to the Motion to Amend Release Conditions.
5. That U.S. Pretrial Services Probation Officer Marlenny Rehmadahl does not object to the lifting of the curfew as a condition of the defendant's release.

WHEREFORE, as a result of the financial burden and his good conduct while on release, the accused requests that the release condition of the curfew be lifted.

Respectfully submitted
Kevin Sanderson,
By his Attorney,

Date: July 31, 2014

/s/Paul J. Garrity
Paul J. Garrity
Bar No. 555976

14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 31st day of July, 2014, a copy of the within Motion to Amend Release Conditions was efiled to all parties on record and was mailed, postage prepaid, to Kevin Sanderson.

/s/Paul J. Garrity
Paul J. Garrity